

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)) Chapter 11
))
CELSIUS NETWORK LLC, <i>et al.</i> , ¹)) Case No. 22-10964 (MG)
))
	Debtors.) (Jointly Administered)
))
DANIEL FRISHBERG,))
))
	Plaintiff,) Adversary Proceeding No. 22-01179 (MG)
v.))
))
CELSIUS NETWORK LLC, <i>et al.</i> ,))
))
	Defendants.)
))
IMMANUEL HERRMANN,))
))
	Plaintiff,) Adversary Proceeding No. 23-01025 (MG)
v.))
))
CELSIUS NETWORK LLC, <i>et al.</i> ,))
))
	Defendants.)
))

**JOINT STIPULATION AND AGREED ORDER BY AND AMONG THE
DEBTORS, DANIEL FRISHBERG AND IMMANUEL HERRMANN STAYING
DEADLINES**

This Stipulation and Agreed Order (this “**Stipulation and Order**”) is made and entered into by and among: (1) the debtors in the above-captioned chapter 11 cases (the “**Debtors**”),

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

(2) Daniel Frishberg, and (3) Immanuel Herrmann ((2) and (3) together, the “**Claimants**,” and together with the Debtors, the “**Parties**”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on December 9, 2022, Daniel Frishberg filed a complaint against certain of the Debtors commencing Adversary Proceeding No. 22-01179 (the “**Frishberg Adversary Proceeding**”);

WHEREAS, on February 9, 2023, Daniel Frishberg filed Proof of Claim No. 24480 (the “**Frishberg Claim**”);

WHEREAS, on February 9, 2023, Immanuel Herrmann filed Proof of Claim No. 24604 (the “**Herrmann Claim**” and collectively with the Frishberg Claim, the “**Claims**”);

WHEREAS, on February 19, 2023, the Debtors objected to the Frishberg Claim [Dkt. No. 2107] and the Herrmann Claim [Dkt. No. 2105] (collectively, the “**Claims Objections**”);

WHEREAS, on March 21, 2023, Mr. Herrmann filed a complaint against the Debtors commencing Adversary Proceeding No. 23-01025 (the “**Herrmann Adversary Proceeding**,” and together with the Frishberg Adversary Proceeding, the “**Adversary Proceedings**”);

WHEREAS, at the status conference on March 21, 2023, the Court requested that the Parties meet and confer to determine a litigation schedule with respect to the Claims Objections;

WHEREAS, consistent with the Court’s direction, the Parties have engaged in discussions to establish a litigation schedule, including a schedule with respect to the Claimants’ Adversary Proceedings;

WHEREAS, the Claimants have indicated an intention to file amended complaints in the Adversary Proceedings;

WHEREAS, the Debtors consent to the Claimants filing amended complaints in their respective Adversary Proceedings.

NOW, THEREFORE, IT IS STIPULATED AND AGREED AND, UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. The foregoing recitals are incorporated herein by reference.
2. All deadlines in the Frishberg Adversary Proceeding and the Herrmann Adversary Proceeding are stayed for a period of thirty (30) days from the date of this Stipulation and Order.
3. The Claimants shall be permitted to amend their respective complaints one additional time without seeking further leave of the Court.
4. Nothing in this Stipulation and Order shall prevent any Party from petitioning the Court for an amended schedule with regard to the Adversary Proceedings upon a showing of good cause.

IT IS SO ORDERED.

New York, New York
Dated: _____, 2023

THE HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY JUDGE

STIPULATED AND AGREED TO THIS 17th DAY OF APRIL, 2023:

New York, New York
Dated: April 17, 2023

/s/ Joshua A. Sussberg, P.C.
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- and -

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Counsel to the Debtors and Debtors in Possession

/s/ Daniel Frishberg
Daniel Frishberg

/s/ Immanuel Herrmann
Immanuel Herrmann